

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Nelson L. Bruce,)	Civil Action No. 2:21-CV-00895-BHH-MGB
)	
Plaintiff,)	
)	
v.)	
)	
T-Mobile USA, Inc., et al.,)	<u>DEFENDANT’S MOTION FOR</u>
)	<u>JUDGMENT ON THE PLEADINGS</u>
Defendants.)	
)	
)	
)	

Defendant, T-Mobile USA, Inc. (“Defendant” or “T-Mobile”), by and through its undersigned counsel, hereby respectfully moves this Court to issue a judgment on the pleadings under Fed. R. Civ. P. 12(c) in favor of Defendant. Defendant is entitled to a judgment as a matter of law based on the allegations pleaded in Nelson L. Bruce’s (“Plaintiff”) Complaint against Defendant in the above-captioned lawsuit. Defendant respectfully requests that this Court dismiss Plaintiff’s Complaint with prejudice

In further support of this Motion, Defendant offers the Federal Rules of Civil Procedure, applicable statutory and case law, the pleadings, arguments of counsel that may be advanced at any hearing, and memoranda of law in support of this Motion filed by Defendant, including but not limited to, the accompanying Memorandum of Law in Support of this Motion for Judgment on the Pleadings and attachments thereto.

Respectfully submitted,

s/ M. Claire Flowers

M. Claire Flowers (Fed. ID No. 13411)

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ATTORNEYS FOR DEFENDANT T-MOBILE
USA, INC.

October 5, 2021

Charleston, South Carolina

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DISTRICT OF SOUTH CAROLINA
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Nelson L. Bruce,)	Civil Action No. 2:21-CV-00895-BHH-MGB
)	
Plaintiff,)	
)	
v.)	
)	
T-Mobile USA, Inc. et al.,)	<u>CERTIFICATE OF SERVICE</u>
)	
Defendants.)	
)	
)	
)	

I hereby certify that a copy of **DEFENDANT'S MOTION FOR JUDGMENT ON THE PLEADINGS** has been served upon Plaintiff by mailing a copy of the same to him, postage prepaid, in the United States Mail, to the address as shown below, on the 5th day of October 2021:

**Nelson L. Bruce
144 Pavilion Street
Summerville, SC 29483**

s/ M. Claire Flowers
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